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File No. 03424-0008

June 3, 2020

BY ECF FILING

MEMO ENDORSED

Hon. Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007
Courtroom 619
ChambersNYSDRamos@nysd.uscourts.gov

Re: *Sharbat et al v. Iovance Biotherapeutics, Inc. et al., 1:20-cv-01391-JM*

Dear Judge Ramos:

We are counsel of record in this matter for defendant Iovance Biotherapeutics, Inc. f/k/a Lion Biotechnologies Inc. f/k/a Genesis Biopharma, Inc. (“Iovance”). On June 1, 2020, defendant Manish Singh also retained us to represent him. We understand that Mr. Singh was served with a Summons and the Amended Complaint on May 15, 2020, and so his response is due on June 5, 2020. Pursuant to Rule 1(E) of your Individual Practices we write to request a two week extension of the deadline for Mr. Singh to respond to the Amended Complaint, so that the response will be due on June 19, 2020. Mr. Singh has not previously requested an extension. We are requesting the extension to provide time for us to prepare a motion to dismiss for lack of personal jurisdiction on Mr. Singh’s behalf. Plaintiffs’ counsel consents to our extension request.

In addition to requesting an extension for Mr. Singh to respond to the complaint, we also request leave to file Mr. Singh’s motion to dismiss without first participating in a pre-motion conference as would otherwise be required by Rule 2(A) of your Individual Practices. As the Court may recall, on April 15, 2020, we participated in a telephonic pre-motion conference with the Court and plaintiffs’ counsel concerning our plan to file a motion to dismiss for lack of personal jurisdiction on behalf of Iovance. At that time, Your Honor granted plaintiffs leave to file an Amended Complaint to more fully set forth their allegations concerning personal jurisdiction and ruled that Iovance could file its motion without participating in another pre-motion conference. Plaintiffs filed their Amended Complaint on May 1, 2020, and Iovance filed its motion on May 22, 2020. As with Iovance’s motion, we do not believe judicial economy would be served by requiring a new pre-motion conference for Mr. Singh’s motion. Plaintiffs’ counsel agrees with our viewpoint on this topic.



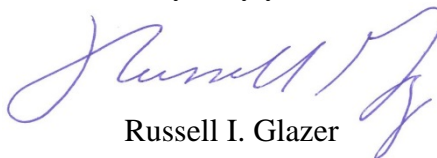
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If the Court grants the foregoing requests, the parties jointly request the following briefing schedule on Mr. Singh's motion to dismiss for lack of personal jurisdiction: (a) June 19, 2020 - deadline for motion; (b) July 10, 2020 - deadline for plaintiffs' opposition to Mr. Singh's motion and Iovance's prior-filed motion to dismiss for lack of personal jurisdiction; (c) July 24, 2020 - deadline for Mr. Singh and Iovance to file their replies.

Finally, pursuant to your Orders dated February 27, 2020 and March 13, 2020, Mr. Clements and I were admitted to represent Iovance in this matter *pro hac vice*. We request that your Orders be deemed to apply also to our representation of Mr. Singh. Plaintiffs' counsel does not object to this request.

Thank you for your consideration of these matters.

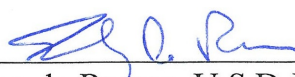
Very truly yours,



Russell I. Glazer

Defendant Manish Singh's request for leave to file a motion to dismiss is granted. Singh's motion to dismiss is due June 19, 2020, Plaintiffs' opposition papers are due on July 10, 2020, and Defendants' replies are due July 24, 2020.

It is SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 6/3/2020
New York, New York